

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of:

PAULETTE N. KING,

Debtor.

NO. 19 B 08025

JUDGE TIMOTHY A. BARNES

Chapter 13

OBJECTION TO CONFIRMATION

Now comes FORD MOTOR CREDIT COMPANY LLC, a creditor herein, by SHERMAN & PURCELL LLP, its attorneys, and for its objection to confirmation of the Debtor's proposed Chapter 13 plan, respectfully represents as follows:

1. That FORD MOTOR CREDIT COMPANY LLC is a creditor of the Debtor with respect to a debt secured by a lien on a 2016 Ford Focus motor vehicle, with a net balance due as of the petition date in the amount of \$17,697.77.

2. That the Debtor's plan fails to require the Debtor to turn over any and all income tax refunds received during the pendency of this case.

3. That, FORD MOTOR CREDIT COMPANY LLC objects to the valuation of the collateral in the plan. The proposed amount fails to reflect the retail value of the collateral.

4. That the proposed interest rate on the secured claim of FORD MOTOR CREDIT COMPANY LLC is not sufficient and fails to protect FORD MOTOR CREDIT COMPANY LLC from the many risks inherent in this case.

5. That the proposed monthly payment to creditor is not sufficient to provide adequate protection, and needs to be significantly increased.

6. That the Petition for Relief in this case was not filed in good faith, and the Debtor's plan has not been proposed in good faith.

WHEREFORE, FORD MOTOR CREDIT COMPANY LLC prays that this Honorable Court enter an Order denying confirmation of the Debtor's proposed Chapter 13 plan, for entry of an Order dismissing this Chapter 13 case, and for such other and further relief as this Court may deem just and equitable.

FORD MOTOR CREDIT COMPANY LLC

BY: /s/ Michael L. Sherman
MICHAEL L. SHERMAN,
One of its Attorneys

MICHAEL L. SHERMAN
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Atty. for FORD MOTOR CREDIT COMPANY LLC

CERTIFICATE OF SERVICE

I, the above signed attorney, certify that on March 26, 2019, I electronically filed the foregoing Objection to Confirmation with the Clerk of the Court using the ECF system which sends notifications of such filing to the following:

Mr. David H. Cutler, Attorney for the Debtor
Ms. Marilyn O. Marshall, Chapter 13 Trustee
Mr. Patrick S. Layng, U.S. Trustee